

Exhibit C



Deposition of:
Thomas Kinney , M.D.

June 17, 2017

In the Matter of:
**In Re: Bard IVC Filters Products
Liability**

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1 mechanical device is placed.

2 Then there are some -- some patients that even
3 despite our best level to anticoagulate them to
4 therapeutic levels, they may extend -- may extend their
5 DVT or may actually get a recurrent pulmonary embolism or
6 a new pulmonary embolism. Those are really the situations
7 that are conveyed by that sentence.

8 Q. And you write, "These patients are treated with
9 insertion of inferior vena cava filters."

10 A. Right.

11 Q. So the thought among physicians was that IVC
12 filters may be effective at preventing pulmonary embolism
13 when a patient can't be anticoagulated?

14 MR. JOHNSON: Form.

15 BY MR. BROWN:

16 Q. Is that right?

17 A. So the difference between IVC filters and
18 anticoagulation is the filters only prevent the pulmonary
19 embolism, but they don't really prevent new clots from
20 forming, so it's -- it's really just that goal is to
21 prevent a pulmonary embolism.

22 Q. And that's the point of the IVC filter?

23 A. Right.

24 Q. In that sense, IVC filters were viewed as
25 potentially lifesaving medical devices?

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1 MR. JOHNSON: Form.

2 THE WITNESS: That's correct.

3 BY MR. BROWN:

4 Q. Could you still place --

5 (Interruption in proceedings.)

6 MR. BROWN: He's had enough.

7 THE WITNESS: I think his cooling jacket just
8 arrived.

9 MR. LOPEZ: He's in Phoenix, so it's probably
10 110 degrees. He did email me saying he had to leave the
11 call for a while.

12 THE WITNESS: I'm sorry, Matthew.

13 BY MR. BROWN:

14 Q. That's all right.

15 Dr. Kinney, do you still place IVC filters in your
16 patients?

17 A. Yes, I do.

18 Q. Your abstract goes on to say, "This article will
19 address attributes of the theoretical ideal IVC filter,
20 recently introduced IVC filters, complications of use of
21 IVC filters, and results of recent IVC filter studies."

22 A. Yes.

23 Q. Do you see that?

24 A. I do.

25 Q. Were you trying to provide readers of this